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May 19, 2022

BY ECF

Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**APPLICATION GRANTED
SO ORDERED** *Vernon S. Broderick*
VERNON S. BRODERICK
U.S.D.J. 05/23/22

Re: *Jones v. The City of New York et al.*
18 CV 1937 (VSB) (GWG)

Dear Judge Broderick:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York, counsel for Defendants the City of New York, Corizon Health, Inc., Commissioner Joseph Ponte, Dr. Rostislav Davydov, and PA Villalobos (“City Defendants”) in the above action, in which *pro se* Plaintiff Michael Jones alleges unconstitutional conditions of confinement and unconstitutional strip searches while incarcerated.

I write request to request permission to file under seal a certified copy of Plaintiff’s medical record that is maintained by NYC Health + Hospitals/Correctional Health Services, which is Exhibit B of the Sprayregen Declaration in Support of City Defendants’ motion for partial summary judgment. Defendants request to file the record under seal to protect Plaintiff’s privacy. The entire medical file—rather than excerpts from the medical file—is needed because, *inter alia*, City Defendants note in their motion that no records have prescribed a “special mattress” and that the medical record from Plaintiff’s time in the custody of the State (rather than City) of New York that Plaintiff “would benefit from a good mattress” is not in the certified records from NYC Health + Hospitals/Correctional Health Services.

Thank you for consideration of this request.

Respectfully submitted,

/s/

Sharon Sprayregen
Assistant Corporation Counsel

cc: Michael Jones
Plaintiff *pro se*
90-A-5292
Sing Sing Correctional Facility
354 Hunter St.
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(via regular mail)

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